

BALISOK & KAUFMAN, PLLC

251 Troy Avenue

Brooklyn, New York 11213

Phone: (718) 928-9607

Fax: (718) 534-9747

Proposed Attorneys for the Debtor and Debtor-in-Possession

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

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In re:

Chapter 11

JUAN ALFARO DESIGN, INC.,

Case No. 19-42177-cec

Debtor.

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**DECLARATION IN OBJECTION TO LANDLORD'S REJECTION OF
DEBTOR'S LEASE**

Joseph Y. Balisok, Esq., declares the following under the penalty of perjury pursuant to
11 U.S.C. § 1746:

1. I am a principal of the law firm of Balisok & Kaufman, PLLC, proposed counsel for Juan Alfaro Design, Inc. (the "Debtor"), and as such I am fully familiar with the facts and circumstances of this case.
2. I make this declaration in objection to the motion seeking to reject Debtor's lease at 183 King Street, Brooklyn, NY 11231, filed by 150 Sullivan Street Realty ("Landlord").
3. This case was commenced on April 10, 2019, by filing a voluntary Chapter 11 petition.
4. The Debtor is a boutique metal fabrication company servicing clients in the New York area. The Debtor maintains its offices and manufacturing space at 183 King Street in Brooklyn.
5. Maintaining the manufacturing and office space at 183 King Street is crucial to Debtor's reorganization, as without it the Debtor cannot acquire revenue to begin rehabilitating its estate and paying back its creditors.

6. Section 365 of the Title 11 Bankruptcy Code establishes that a Debtor can assume an unexpired lease of nonresidential real property under which the debtor is the lessee within 120 days of filing the order for relief. The Debtor is currently within the timeframe required by law. 11 U.S.C. 365(d)(4)(A)(i).

Dated: Brooklyn, New York
June 18, 2019

/s/ *Joseph Y. Balisok*
Joseph Y. Balisok, Esq.
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